

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
)	
Plaintiff,)	C.A. No. 16-122-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.)	
)	
)	
Defendant.)	

NOTICE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the following document was caused to be served on September 15, 2017, upon the following attorneys of record as indicated below:

**PLAINTIFF’S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES
TO DEFENDANT GROUPON, INC.’S FIRST SET OF INTERROGATORIES
TO PLAINTIFF INTERNATIONAL BUSINESS MACHINES CORPORATION
(NOS. 1-3, 7, 9, 11) (HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY)**

VIA ELECTRONIC MAIL

John G. Day
Andrew C. Mayo
Ashby-Geddes
500 Delaware Avenue, 8th Floor
P.O. Box 1150
Wilmington, DE 19899
jday@ashby-geddes.com
amayo@ashby-geddes.com

J. David Hadden
Saina S. Shamilov
Phillip J. Haack
Adam M. Lewin
Fenwick & West LLP
555 California Street, 12th Floor
San Francisco, CA 94104
dhadden@fenwick.com
sshamilov@fenwick.com
phaack@fenwick.com
alewin@fenwick.com
[Groupon IBM Service@fenwick.com](mailto:Groupon_IBM_Service@fenwick.com)

Tron Y. Fu
Marshall, Gerstein And Borun LLP
233 South Wacker Drive
6300 Willis Tower
Chicago, IL 60606-6357
TFu@marshallip.com

OF COUNSEL:

John M. Desmarais
Jon T. Hohenthanner
Karim Oussayef
Laurie N. Stempler
Robert C. Harrits
Brian D. Matty
Michael Matulewicz-Crowley
Kevin K. McNish
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212) 351-3400

Dated: September 8, 2017
5393074 / 43155

POTTER ANDERSON & CORROON LLP

By: /s/ Stephanie E. O'Byrne
David E. Moore (#3983)
Bindu A. Palapura (#5370)
Stephanie E. O'Byrne (#4446)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
sobyne@potteranderson.com

Attorneys for Plaintiff
International Business Machines Corporation